

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Jan 04, 2016**

SEAN F. MCAVOY, CLERK

UNITED STATES OF AMERICA

Plaintiff,

v.

CATHERINE ANN TOWNSEND,

Defendant.

Case No. 4:15-CR-6038-SMJ

PROTECTIVE ORDER AND ORDER TO

DISCLOSE § 6103 INFORMATION

Pursuant to the motion of the United States, Federal Rule of Criminal Procedure 16(d), and to prevent premature disclosure of evidence to other targets, subjects, and witnesses of ongoing investigations,

IT IS HEREBY ORDERED that the Defense, which includes the Defendant, the Defendant's counsel, and the Defendant's counsel's assistants shall not, without prior approval of this Court or as set forth herein, disclose the substance of any discovery material received from the United States in the above-captioned matter to any third party, unless such material is already a matter of public record.

IT IS FURTHER ORDERED that any discoverable documents that were filed under seal are unsealed for the limited purpose of allowing the United States to provide them to the Defense in discovery and to the extent that any of the criminal discovery

1 materials contain any individual's personal information, the  
2 Defense shall redact any filings referencing or containing said  
3 materials.

4 Under 26 U.S.C. § 6103(h) (4) (D),

5 IT IS FURTHER ORDERED that the United States shall produce  
6 to the Defendant discovery materials under Rule 16 of the  
7 Federal Rules of Criminal Procedure and 18 U.S.C. § 3500 that  
8 include tax return information protected by 26 U.S.C. § 6103(a).  
9 Disclosure of tax return information in a federal judicial  
10 proceeding may be authorized by court order under 26 U.S.C.  
11 § 6103(h) (4) (D).

12 Under Rule 16(d) of the Federal Rules of Criminal  
13 Procedure,

14 IT IS FURTHER ORDERED that the United States, which  
15 includes the United States Attorney, the Special Assistant  
16 United States Attorneys assigned to this case, and other  
17 assistants to the United States, and the Defense, which includes  
18 the Defendant, the Defendant's counsel, and the Defendant's  
19 counsel's assistants shall not disclose the substance of any  
20 discovery material produced to the Defendant or obtained by the  
21 United States from the Defendant--unless such material is  
22 already a matter of public record--to representatives of the  
23 media or other third parties not involved in the investigation  
24 or prosecution of the case.

1           Nothing contained herein shall prevent the Defendant or the  
2 Defendant's counsel from disclosing such discovery material to  
3 other attorneys, private investigators, experts, secretaries,  
4 law clerks, paralegals, or other persons who are working for the  
5 Defendant and their counsel (collectively referred to as "the  
6 Defense") in the investigation or preparation of this case  
7 without prior court order, provided that the Defense informs any  
8 such individual(s) of this Order and obtains his or her written  
9 agreement to be bound by its terms.

10           Further, nothing contained herein shall preclude the  
11 Defendant, the Defendant's counsel, or the Defendant's  
12 assistants from conducting a normal investigation of the facts  
13 of this case on behalf of the Defendant. Further, nothing  
14 contained herein shall preclude the United States and its  
15 assistants from continuing to investigate the facts of this case  
16 or from conducting an investigation of other criminal activity.  
17 In connection with any such investigation, it shall not be  
18 necessary that the United States or the Defense obtain prior  
19 permission of this Court. The Defense may show witnesses  
20 discovery materials as necessary for the preparation of the  
21 Defense, but may not give copies or the materials to witnesses  
22 absent further order of the Court.

23           Should counsel withdraw or be disqualified from  
24 participation in this case, any material received and any copies  
25

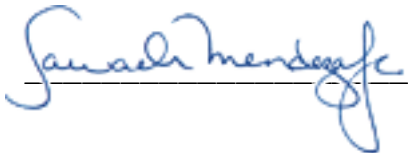
1 derived therefrom shall be returned to the United States within  
2 ten days. Defense counsel shall be required to communicate the  
3 substance of this order and explain it to their client and  
4 assistants before disclosing the substance of the discovery to  
5 their client or assistants.

6 The Defense shall return any and all copies of the  
7 discovery to the United States within 90 days of the conclusion  
8 of the proceedings in the above-referenced case, including any  
9 appeal.

10 Each counsel of record shall sign a copy of this Protective  
11 Order, acknowledging its terms and agreeing to comply with them,  
12 and ensure that every member of his or her team is advised of  
13 the Order and agrees in writing to be bound by its terms.

14 IT IS SO ORDERED.

15  
16 DATED: 01/04/2016

SIGNED: \_\_\_\_\_

18 HONORABLE Salvador Mendoza, Jr.

19 United States District Judge  
20  
21  
22  
23  
24  
25

ACKNOWLEDGEMENT

I have reviewed the foregoing protective order and I agree to be bound by its terms.

DATED: \_\_\_\_\_

SIGNED: \_\_\_\_\_

DATED: \_\_\_\_\_

SIGNED: \_\_\_\_\_

DATED: \_\_\_\_\_

SIGNED: \_\_\_\_\_